

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

DR. MAY FRANCIS BRIDGES

PLAINTIFF

VS.

CIVIL ACTION NO. 3:15CV-917-WHB-JCG

JACKSON STATE UNIVERSITY

DEFENDANT

PLAINTIFF'S MOTION TO AMEND COMPLAINT

COMES NOW, Plaintiff, by and through undersigned counsel, and files this her Response to the defendant's Motion and for grounds would show unto the Court the following to wit:

1. May Francis Bridges ("Bridges") Plaintiff filed this employment discrimination action on or about December 18, 2015. The defendants filed a Motion to Dismiss Bridges' Title VII for gender discrimination and retaliation.
2. Defendants argue that Bridges failed to pled sufficient factual matter to survive a motion to dismiss under Rule 12(b)(6). Bridges' former counsel responded to the Motion to Dismiss on February 1, 2016 and requested that she be allowed to amend her Complaint should this Court find that Bridges' Complaint failed to allege sufficient facts to put Defendant on notice as to the claims that are being pursued against Defendant.
3. Plaintiff's previous counsel did not attach the Amended Complaint to her Response to the defendant's Motion to Dismiss. Bridges now files this Motion to Amend her Complaint and has attached the Amended Complaint as Exhibit A.
4. Plaintiff requests that this Court relief her of the requirement to file a separate memorandum due to the straightforward nature of her Motion to Amend.

WHEREFORE PREMISES CONSIDERED, Dr. Bridges requests that this Court deny the defendant's Motion to Dismiss and allow the her to file her Amended Complaint.

RESPECTFULLY SUBMITTED, this the 17th day of May, 2016.

Dr. May Francis Bridges

/s Lisa M. Ross
Lisa M. Ross (MSB# 9755)
Post Office Box 11264
Jackson, MS 39283-1264
(601) 981-7900 (telephone)
(601) 981-7917 (facsimile)

CERTIFICATE OF SERVICE

I, Lisa M. Ross, do hereby certify that I have this day electronically filed the above and foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record:

This the 17th day of May, 2016.

//s//Lisa M. Ross